Judge Ricardo S. Martinez

2 3 4 5 6 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 7 AT SEATTLE 8 9 NO. CR12-133RSM UNITED STATES OF AMERICA, 10 Plaintiff 11 STIPULATION AND PROPOSED 12 ORDER REGARDING REDACTION ٧. OF EXHIBIT 701 13 MARK F. SPANGLER, 14 15 Defendant. 16 COMES NOW the United States of America, by and through Jenny A. Durkan, 17 United States Attorney for the Western District of Washington, and Michael Lang, Carl 18 Blackstone, Francis Franze-Nakamura Assistant United States Attorneys for said District, 19 and Defendant MARK F. SPANGLER, and his attorneys, Jon Zulauf and John Carpenter, 20 and agree and stipulate as follows, pursuant to Local Criminal Rule 49.1 which addresses 21 the need to protect the privacy of individuals: 22 Exhibit 701 is a bulk exhibit that contains voluminous financial documents. 23 1. The United States intends to introduce this exhibit as back up for numerous financial 24 25 summaries and charts.

Due to the large number of documents in this bulk exhibit, the United

States will not perform any redaction on Exhibit 701. However, to the extent the United

States intends to display individual documents from Exhibit 701 to the jurors in open

1

26

27

28

2.

1	court, the United States shall ensure that redactions are performed on that document in
2	accordance with Local Criminal Rule 49.1.
3	3. The parties agree that the foregoing procedure will adequately protect the
4	personally identifying information of individuals involved in the case.
5	
6	DATED this day of Och 3, 2013
7	
8	
9	Cal Ila
10	CARL BLACKSTONE
11	Assistant United States Attorney
12	
13	MMM
14	MICHAEL LANG
15	Assistant United States Attorney
16	
17	72
18	FRANCIS FRANZE-NAKAMURA
19	Assistant United States Attorney
20	
21	
22	JONZULAUF
23	Attorney for Defendant Spangler
24	
25	1 Lancier A
26	JOHN CARPENTER
27	Attorney for Defendant Spangler
28	
	Stipulation Regarding Redaction of Exhibit 701 - 2 UNITED STATES ATTORN

1	The procedure regarding re	redaction of Exhibit 701, as agreed to in the parties'
2	foregoing stipulation, is	
3	HEREBY APPROVED.	
5		
6		THE HONORABLE RICARDO S. MARTINEZ
7		United States District Judge
8		
9		
10		
11		
12		,
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26	·	
27	·	
28		·

1	CERTIFICATE OF SERVICE
2	I hereby certify that on October 9, 2013, I electronically filed the foregoing with
3	the Clerk of Court using the CM/ECF system which will send notification of such filing
4	
5	to the attorneys of record for the defendant.
6	ss/ Bonnie R. Wolfgram
7	BONNIE R. WOLFGRAM Paralegal
8	United States Attorney's Office
10	700 Stewart Street, Ste. 5220 Seattle, WA 98101
11	Phone: 206-553-2520
12	Facsimile: 206-553-2502 E-mail: Bonnie.Wolfgram@usdoj.gov
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	

CERTIFICATE OF SERVICE